

Exhibit 3

Exhibit 3:
Bases for PHEAA's Motion to Dismiss the Consolidated
Amended Class Action Complaint by Jurisdiction and Plaintiff¹

		No PSLF/TEACH Standing	No TEACH Injury	No PSLF Injury	No IDR Injury	Not third-party beneficiaries	No Unjust Enrichment	No Fiduciary Duty	No Duty As A Loan Servicer	No Negligence <i>Per Se</i>	No Representation By PHEAA	No Consumer Protection Claim	9(b) – Consumer Protection Statute	9(b) – Constructive Fraud	9(b) – Negligent Misrepresentation
Argument Section		V.C.1-2	V.C.3 ²			V.D.1 ³	V.D.2	V.D.3.b	V.D.3.c	V.D.3.d	V.D.4	V.D.5	V.E		
Alabama	Bonham					•	•	•	•	•					•
California	Stevens					•	•	•	•	•	•	•	•	•	•
	Gupta	•		•		•	•	•	•	•	•	•	•	•	•
	Arany					•	•	•	•	•	•	•	•	•	•
Connecticut	Davis		•		•	•	•	•	•	•			•		•

¹ Exhibit 3 does not depict PHEAA's derivative sovereign immunity or preemption arguments, which apply to all of Plaintiffs' claims.

² The twelve Plaintiffs identified in Sections V.C.1 and V.C.2 of PHEAA's memorandum have not established standing or ripeness, and therefore provide no basis for Plaintiffs collectively to assert PSLF or TEACH claims in the relevant jurisdictions, as PHEAA argues in Section V.C.3.

³ PHEAA's arguments for dismissal in Sections V.D and V.E are independent of its grounds for dismissal on the basis of derivative sovereign immunity, preemption, and standing.

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Argument Section		V.C.1-2	V.C.3 ²			V.D.1 ³	V.D.2	V.D.3.b	V.D.3.c	V.D.3.d	V.D.4	V.D.5	V.E		
D.C.	Gallagher	•	•	•		•	•	•	•	•		•		•	•
Florida	Turnage			•		•	•	•	•	•			•		•
	Asby			•		•	•	•	•	•	•		•		•
Illinois	Rockwell			•		•	•	•	•	•	•		•	•	
	Charles			•		•	•	•	•	•			•	•	
	Musser			•		•	•	•	•	•	•		•	•	
	Puccini			•		•	•	•	•	•	•		•	•	
Kansas	Jones	•	•	•	•	•	•		•	•	•	•	•	•	
Maryland	Lathrop		•		•	•	•	•	•	•			•	•	
Massachusetts	Webb	•		•	•	•	•	•	•	•	•	•	•	•	•
Missouri	King	•	•	•		•	•			•			•	•	•
New Jersey	Leone		•			•	•	•	•	•			•	•	•
	Coleman	•	•	•		•	•	•	•	•			•	•	•
	Johnson		•			•	•	•	•	•			•	•	•
New York	Wardlow			•		•	•	•	•	•	•			•	•

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Argument Section		V.C.1-2	V.C.3 ²			V.D.1 ³	V.D.2	V.D.3.b	V.D.3.c	V.D.3.d	V.D.4	V.D.5	V.E		
	Brady			•		•	•	•	•	•	•			•	•
Oregon	Pruess		•			•	•	•	•	•					
	Wolff		•			•	•	•	•	•					
Pennsylvania	Morris	•	•			•	•	•	•	•					
	Hawkins		•			•	•	•	•	•	•	•			
	Pryor		•			•	•	•	•	•	•				
	Harig	•	•	•		•	•	•	•	•		•			
Tennessee	Meyer	•				•	•	•	•	•				•	•
Virginia	Levis	•				•	•	•	•	•				•	•
	Miller	•				•	•	•	•	•				•	•
	Shelley					•	•	•	•	•				•	•
Washington	Anderson		•			•	•			•			•	•	•
	Meckfessel	•	•	•		•	•			•			•	•	•